

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

CHARLESTON DIVISION

**In re Ethicon, Inc. Pelvic Repair System
Products Liability Litigation**

MDL No. 2327

THIS DOCUMENT RELATES TO ALL CASES

**PLAINTIFFS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE
RESPONSES TO DEFENDANTS' PENDING MOTIONS AS OF THE DATE OF THE
MDL TRANSFER**

COME NOW Plaintiffs and hereby file this Unopposed Motion for Extension of Time to File their Responses to Defendants' Pending Motions as of the Date of the MDL Transfer, which are listed in the Notice of Pending Motions (Dkt. No. 106), respectfully showing the Court as follows:

Pursuant to Pretrial Order No. 1, Ethicon, Inc. and Johnson & Johnson filed the Notice of Pending Motions (Dkt. No. 106), which lists the defense motions¹ pending in the member cases of this MDL at the time of their transfer to this Court. At the initial pre-trial conference, the parties were asked to agree to a deadline for Plaintiffs' responses to the pending motions. Counsel for the parties have conferred, and Defendants' counsel have agreed to an extension for Plaintiffs' responses to the pending defense motions through and including June 24, 2012.

Plaintiffs therefore respectfully request that the Court enter an Order granting an extension until June 24, 2012 to file their responses to Defendants' pending motions. The requested extension would consolidate the due dates for Plaintiffs' responses to the various motions filed by Defendants.

Plaintiffs' counsel has conferred with Defendants' counsel and Defendants do not oppose

¹ Multiple defendants have motions pending in the Ethicon MDL.

this extension.

WHEREFORE, the Plaintiffs pray that this motion be granted and the deadline for Plaintiffs' Responses to Defendants' pending motions as of the date of MDL transfer be extended through and including June 24, 2012.

Respectfully submitted this 30th day of April, 2012.

**PLAINTIFFS' COORDINATING
CO-LEAD COUNSEL**

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CERTIFICATE OF SERVICE

I hereby certify that on April 30, 2012, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

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